

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor 1

PROMESA - TITLE III

Case No. 17-3283-LTS
(Jointly Administered)

**SECOND VERIFIED STATEMENT OF IVONNE GONZALEZ –
MORALES (IGM) PURSUANT TO FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure and the Court's June 8, 2020 Twelfth Amended Notice, Case Management and Administrative Procedures order [Docket No. 13383-1], Ivonne Gonzalez- Morales (IGM) gives notice of representation of more than one creditor in the above-captioned bankruptcy case, and states as follows:

1. That Ivonne Gonzalez Morales represents the following group of creditors holding ordinary course of employment claims, in the above-captioned cases:

I. CASES WITH FINAL JUDGMENTS

- a. Juan Pérez-Colón et al (324 Plaintiffs} collectively (the "Perez-Colon Plaintiffs Group)TPI K AC1990-0487; (Docket no. 3506).
- b. Jeannette Abrams-Diaz et al (1084 Plaintiffs) collectively (the Abrams-Diaz plaintiffs Group), TPI KAC 2005-5021; (Docket no.3505).

¹The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

- c. Agosto-Maldonado, Plaintiffs Group; collectively (729 plaintiff's) Agosto Maldonado, Nilda A. ; K PE 2005-0608; (Docket 13534)
- d. Cruz-Hernandez, Carmen Socorro Plaintiff Group (334 plaintiffs) TPI K AC1991-0665;(Docket 13535)
- e. Group of creditors of the Consolidated CFI Judgments dated April 22,2016 (Norberto Tomassini et al & Ivan Ayala; Plaintiff, A MI 2003-0243 y A PE 2005-0049)(87 Plaintiffs);Verified statement filed 05/7/18)

II. PENDING CASES

- f. Abraham-Gimenez, et al (1,046 Plaintiffs) collectively (the Abraham Gimenez Plaintiffs Group;TPI K AC 20131019; (Claim 22819) (Verified Statement -Docket no. 3401)
- g. Alejo Cruz – Santos, et al (262 Plaintiffs') collectively (the Cruz Santos Plaintiff Group) CASP 2002-06-1493. (Claim 29642)(Verified Statement pursuant FRBP 2019, Docket no. 3405)
- h. Prudencio Acevedo-Arocho, et al (1,601 Plaintiffs)TPI KAC 2005-5022,; (Verified Statement pursuant FRBP 2019 Docket no. 3402)
- i. Delfina Lopez-Rosario, et al Collectively The Lopez-Rosario Plaintiffs Group); (1,345 plaintiffs) CASP 01-10-372; (Claim 15708) (Verified Statement pursuant FRBP 2019, Docket no. 3404)
- j. Beltran-Cintron, Plaintiff Group collectively (the Beltran-Cintron Plaintiff Group(4,593 Plaintiffs);TPI num K AC2009-0809);(Verified Statement pursuant FRBP 2019- Docket no. 3403)
- k. Madeline Acevedo-Camacho et al (2,518 Plaintiffs) CASP no 2016-05-1340 (Verified Statement pursuant FRBP 2019 -Docket no. 3406)

1. IGM asserts the following categories of disclosable economic interests against the Title III Debtors on behalf of those employees or ex-employees of the Title III Debtors with respect to whom the **(I) against the Commonwealth of Puerto Rico (“Commonwealth”) , judgments awards related to violation of applicable labor and employment laws** (presently estimated to be in the aggregate magnitude of \$ 85,965,507.66) distributed as follows:

- a. Juan Pérez-Colón et al (324 Plaintiffs} collectively (the “Perez-Colon Plaintiffs Group)TPI K AC 1990-0487; (\$ 2,435,987.21)

- b Jeannette Abrams-Diaz et al (1084 Plaintiffs) collectively (the Abrams-Diaz plaintiffs Group)TPI KAC 2005-5021 (\$ 43,400,081.58)
- c. Agosto-Maldonado, Plaintiffs Group;, collectively (729 plaintiff's) Agosto Maldonado, Nilda et als. K PE 2005-0608; (\$ 34,199,788.76)
- d. Cruz-Hernandez, Carmen Socorro Plaintiff Group (334 plaintiffs)TPI K AC1991-0665;(\$ 1,019,983.01)
- e. Group of creditors of the Consolidated CFI Judgments dated April 22,2016 (Norberto Tomassini et al & Ivan Ayala; Plaintiff, A MI 2003-0243 y A PE 2005-0049)(87 Plaintiffs); (\$ 4,909,667.10)
- in the pending cases, is estimated in \$227,000,000.00 distributed as follows:
 - f. Abraham-Gimenez, et al (1,046 Plaintiffs) collectively (the Abraham Gimenez Plaintiffs Group;TPI K AC 20131019; (\$ 35,000.000.00)
 - g. Alejo Cruz – Santos, et al (262 Plaintiffs') collectively (the Cruz Santos Plaintiff Group) CASP 2002-06-1493. (\$ 5,000,000.00)
 - h. Prudencio Acevedo-Arocho, et al(1,601 Plaintiffs)TPI KAC 2005-5022; (\$ 28,000,000.00)
 - i. Delfina Lopez-Rosario, et al Collectively The Lopez-Rosario Plaintiffs Group); (1,345 plaintiffs) CASP 01-10-372; (\$ 24,000,000.00)
 - j. Beltran-Cintrón, Plaintiff Group collectively (the Beltran-Cintrón Plaintiff Group(4,593 Plaintiffs);TPI num K AC2009-0809); (\$ 85,000,000.00)
 - k. Madeline Acevedo-Camacho et al (2,819 Plaintiffs) CASP no 2016-05- 1340 (\$ 50,000,000.00), and

(II) against the Commonwealth and against **the Employee Retirement System, case 17 bk 03566** for accrued pension adjustments obligations (in the aggregate magnitude of greater than \$ 54,781,871.60 due, *inter alia*, under the laws of the Commonwealth and the terms of the Title III Debtors' various employee benefit plans, whether or not those plans are subject to any Collective Bargaining Agreements (CBA).

- a. Juan Pérez-Colón et al (324 Plaintiffs} collectively (the "Perez-Colon Plaintiffs Group)TPI K AC 1990-0487; claim no. 633 filed 06/29/18 (\$1,469,956.00)

- b. Jeannette Abrams-Diaz et al (1084 Plaintiffs) collectively (the Abrams-Diaz plaintiffs Group)TPI KAC 2005-5021; claim no. 631 filed 06/29/18 (\$5,829,644.40).
- c. Agosto-Maldonado, Plaintiffs Group;, collectively (729 plaintiff's) Agosto Maldonado, Nilda A. y/o 504 K PE 2005-0608; claim no. 632 filed 06/29/18 (\$3,172,886.68.)
- d. Group of creditors of the Consolidated CFI Judgments dated April 22,2016 (Norberto Tomassini et al & Ivan Ayala; Plaintiff, A MI 2003-0243 y A PE 2005-0049)(87 Plaintiffs);claim no. 640 filed 06/29/18 (\$321,897.84)

II. PENDING CASES

- e. Abraham-Gimenez, et al (1,046 Plaintiffs) collectively (the Abraham Gimenez Plaintiffs Group;TPI K AC 20131019; claim no. 642 , (\$ 6,293,000.00)
- f. Alejo Cruz – Santos, et al (262 Plaintiffs') collectively (the Cruz Santos Plaintiff Group) CASP 2002-06-1493. Claim no. 644 filed 06/29/18 (\$ 899,000.00)
- g. Prudencio Acevedo-Arocho, et al (1,601 Plaintiffs)TPI KAC 2005-5022; Claim no. 635 filed 06/29/18 (\$ 5,034,400.00)
- h. Delfina Lopez-Rosario, et al Collectively The Lopez-Rosario Plaintiffs Group); (1,345 plaintiffs) CASP 01-10-372; claim no. 641 filed 06/29/18 (\$ 4,315,200.00)
- i. Beltran-Cintron, Plaintiff Group collectively (the Beltran-Cintron Plaintiff Group(4,593 Plaintiffs);TPI num K AC2009-0809); claim 634 filed 06/29/18 (\$ 15,283,000.00)
- j. Madeline Acevedo-Camacho et al (2,518 Plaintiffs) CASP no 2016-05-1340 claim no. 637 filed 06/29/18 (\$ 8,990,000.00)

2. In addition to the cases identified in the preceding paragraph, IGM assert Disclosable economic interests of its own against any of the Title III Debtors, and on the date of this filing.

3. IGM reserves the right to amend this Statement.

4. The undersigned, Ivonne Gonzalez Morales, counsel of the above Identified group claimants, hereby verifies that this Statement is true and accurate to the best of his knowledge, information, and belief.

Executed this 1th day of July 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of July 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Case Management and Administrative Procedures order in this case.

By /s/ Ivonne González Morales
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